Clay M. Taylor
State Bar I.D. No. 24033261
clay.taylor@bondsellis.com
M. Jermaine Watson
State Bar I.D. No. 24063055
Jermaine.Watson@bondsellis.com
J. Robbie Clarke
State Bar I.D. No. 24108098
Robbie.Clarke@bondsellis.com
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE: § CHAPTER 11

§ 8

FIELDWOOD ENERGY LLC, et al.

S

CASE NO. 20-33948 (MI)

§ §

Debtors. § Jointly Administered

CERTIFICATE OF NO OBJECTION REGARDING THE AMENDED MOTION OF MARATHON OIL COMPANY TO ALLOW A LATE FILED PROOF OF CLAIM WITHOUT PENALTY PURSUANT TO RULES 3003(C)(3) AND 9006(B)(1) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE [Related to Docket No. 743]

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the "<u>Complex Case Procedures</u>"), the undersigned counsel for Marathon Oil Company ("<u>Marathon</u>") certifies as follows:

On January 5, 2021, Marathon filed the Amended Motion of Marathon Oil Company to Allow a Late Filed Proof of Claim without Penalty [Docket No. 743] (the "Motion").

1. In accordance with Local Bankruptcy Rule 9007-1, the Motion contained negative notice language and established January 26, 2021 as the deadline for parties to object to or file

Case 20-33948 Document 957 Filed in TXSB on 03/09/21 Page 2 of 9

responses to the Application (the "Objection Deadline").

2. On the same day the Application was filed it was also served on all parties that are

registered or otherwise entitled to receive notices in this case pursuant to the Court's ECF system,

which includes the Debtor, the Unsecured Creditor's Committee and the U.S Trustee.

3. Through a series of extensions, by and between Marathon and the Debtors, the

Objection Deadline was extended, as to the Debtors only, a few times. But that extended Objection

Deadline as to the Debtors only has passed and the Debtors have affirmatively stated in writing to the

undersigned counsel that they are not going to be filing any opposition to the Motion.

4. The undersigned counsel hereby certifies that no formal objections to the Application

have been filed of record and that counsel is unaware of any formal or informal opposition to the

relief requested in the Motion.

5. The proposed form of order is attached hereto as Exhibit A, and a redline of the

proposed form of order as compared the original form of order filed with the Motion (changes made

to incorporate the extensions of the Objection Deadline as to the Debtor noted above in paragraph 3)

is attached hereto as Exhibit B.

Date: March 9, 2021 Respectfully submitted,

/s/ Clay M. Taylor

Clay M. Taylor State Bar I.D. No. 24033261 M. Jermaine Watson State Bar I.D. No. 24063055

J. Robertson Clarke

State Bar I.D. No. 24108098

BONDS ELLIS EPPICH SCHAFER JONES LLP

420 Throckmorton Street, Suite 1000

Fort Worth, Texas 76102 (817) 405-6900 telephone (817) 405-6902 facsimile

<u>Clay.Taylor@bondsellis.com</u> <u>Jermaine.Watson@bondsellis.com</u> Robbie.Clarke@bondsellis.com

CERTIFICATE OF SERVICE

I certify that on March 9, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clay M. Taylor Clay M. Taylor

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

In re: § Chapter 11

§ § FIELDWOOD ENERGY LLC, et al., Case No. 20-33948 (MI)

§ (Jointly Administered)

Debtors.¹

ORDER GRANTING AMENDED MOTION OF MARATHON OIL COMPANY TO ALLOW A LATE FILED PROOF OF CLAIM WITHOUT PENALTY **PURSUANT TO RULES 3003(c)(3) AND 9006(b)(1)** OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Upon the Amended Motion of Marathon Oil Company to Allow a Late Filed Proof of Claim Without Penalty Pursuant to Rules 3003(c)(3) and 9006(b)(1) of the Federal Rules of Bankruptcy *Procedure* (the "Motion"); and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334, and in consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that notice of the Motion was reasonable and sufficient under the circumstances, and it appearing that no other or further notice need be provided and that no objection had been filed to the Motion, this Court having reviewed the Motion, and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Holdings LLC (9264); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

- 2. Marathon Oil Company ("Marathon") is authorized to file a late proof of claim pursuant to Rules 3003(c)(3) and 9006(b)(1) of the Federal Rules of Bankruptcy Procedure.
- 3. Marathon's proof of claim shall be deemed timely filed on the date it is submitted into the claim registry without penalty provided that the claim is submitted within 21 days of the date of entry of this Order.

Dated:	
	THE HONORABLE MARVIN ISGUR
	UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

\$ Chapter 11

\$ Case No. 20-33948 (MI)

\$ (Jointly Administered)

ORDER GRANTING AMENDED MOTION OF MARATHON OIL COMPANY TO ALLOW A LATE FILED PROOF OF CLAIM WITHOUT PENALTY PURSUANT TO RULES 3003(c)(3) AND 9006(b)(1) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Upon the Amended Motion of Marathon Oil Company to Allow a Late Filed Proof of Claim Without Penalty Pursuant to Rules 3003(c)(3) and 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the "Motion"); and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334, and in consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that notice of the Motion was reasonable and sufficient under the circumstances, and it appearing that no other or further notice need be provided, and that no objection had been filed to the Motion, this Court having reviewed the Motion, and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.

Deleted: ;

Deleted: ;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Holdings LLC (9264); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

2.	Marathon Oil Company ("Marathon") is authorized to file a late proof of claim
pursuant to R	ules 3003(c)(3) and 9006(b)(1) of the Federal Rules of Bankruptcy Procedure.

	3.	Marathon's proof of claim shall be deemed timely filed on the date it is submitted
into	the claim	registry without penalty provided that the claim is submitted within 21 days of the
date	of entry	of this Order.

Dated:	
·	THE HONORABLE MARVIN ISGUR
	LINITED STATES BANKRUPTCY HIDGI